

NEAL GLESSNER

Plaintiff

v.

CHARDAN, LLC

Defendants.

\* IN THE CIRCUIT COURT

\* OF MARYLAND

\* FOR WASHINGTON COUNTY

\* Case No.: C-21-CV-22-000156

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\* \* \* \* \*

**JOINT MOTION TO VACATE SCHEDULING ORDER**

NOW COMES, Defendant, CharDan, LLC, by and through their attorney, Nicholas Schaufelberger, and Plaintiff, Neal Glessner, by and through his attorney Adam Greivell, and respectfully requests that the Scheduling Order in this case be vacated and in support states the following:

1. This case arises out of a dispute on February 18, 2022, at a restaurant and bar called Dan's Restaurant & Tap House (hereafter, "Dan's").
2. This Court held a Scheduling Conference on September 2, 2022, which set the Discovery deadline in this matter on May 5, 2023, and set the first day of trial on July 17, 2023.
3. On March 31, 2023, Plaintiff filed a Fourth Amended Complaint, which added three additional Defendants, Alex Thaggard, Michael Skinner, and Charlotte Aufdem-Brinke.
4. Plaintiff, through counsel, has represented that these additional parties will be served with all Court documents shortly.

5. It is expected that Alex Thaggard, Michael Skinner, and Charlotte Aufdem-Brinke will retain their own counsel, and that they will also expect to engage in the Discovery process.

6. Additional, a number of depositions have yet to be conducted, including those of Alex Thaggard, Michael Skinner, and Charlotte Aufdem-Brinke. It is not expected that these can be conducted before the close of discovery considering the need for the new parties to be served and obtain counsel.

7. After conferring with counsel for Plaintiff, all counsel believe it is necessary to vacate the scheduling order and set a new scheduling conference so that the additional parties of Alex Thaggard, Michael Skinner, and Charlotte Aufdem-Brinke, and their counsel, can participate.

8. No prior postponement or alteration to the scheduling order has been previously requested by either party, and no party will be prejudiced by this request.

WHEREFORE, for the foregoing reasons, Defendant, CharDan, LLC, by and through their attorney, Nicholas Schaufelberger, and Plaintiff, Neal Glessner, by and through his attorney Adam Greivell, respectfully request that this Honorable Court vacate the existing Scheduling Order and set a new Scheduling Conference.

\_\_\_\_\_/s/\_\_\_\_\_

Charles B. Peoples, Esquire  
Attorney ID No. 0812180016  
Nicholas A. Schaufelberger, Esquire  
Attorney ID No. 1612140223  
Thomas, Thomas & Hafer LLP  
1025 Connecticut Ave., NW, Suite 608  
Washington, DC 20036  
202-945-9502 (t)  
202-945-9509 (f)

*Counsel for Defendant*

\_\_\_\_\_/s/\_\_\_\_\_  
Adam D. Greivell, Esquire  
CPF ID# 0512130328  
Greivell & Garrott Johnson, LLC  
5 Cornell Avenue  
Hagerstown, Maryland 21742  
(240) 310-9150  
[adam@greivelllawoffice.com](mailto:adam@greivelllawoffice.com)  
Attorneys for Plaintiff